

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to: All Cases

JERRY S. GOLDMAN, Esq., hereby states under penalty of perjury, as provided for by 28 U.S.C. § 1746, as follows:

1. I am an attorney representing Plaintiffs in the above-captioned litigation and a member of the Plaintiffs' Executive Committee. I submit this declaration in support of the Petition for Writ of *Habeas Corpus Ad Testificandum* for the production of Jamal al Fadl to provide deposition testimony on September 26, 2019 at 10 a.m.

2. Based upon my knowledge of this case, having served as lead counsel for the *O'Neill* group of plaintiffs for over fifteen (15) years and my role as a member of the Plaintiffs' Executive Committee, as well as my review of public source documents, including, without limitation, the trial transcripts of *United States of America v. Usama bin Laden, et al.*, 98 Cr. 1023 (LBS) (S.D.N.Y, 2001), I believe that Jamal Ahmed al Fadl can provide material and relevant testimony as to the matters in question as to this litigation. On information and belief, the source of which includes such trial transcripts, Mr. Fadl was an early member of al Qaeda, was close with Osama bin Laden (a/k/a Usama bin Laden), and has detailed knowledge of al Qaeda's organizational structure and finances, prior to the time of his cooperation with the United States, which began in the mid-1990's.¹

3. Attached as Exhibit A is a true and correct copy of a Letter from Sarah Normand, Esq. to Plaintiffs' Executive Committees, dated June 25, 2019.

¹ Mr. Fadl testified in open court on February 6, 2001.

4. Attached as Exhibit B is a true and correct copy of a letter from Jerry S. Goldman on behalf of the Plaintiffs' Executive Committees to Sarah Normand, dated June 28, 2019.

Dated: July 1, 2019
New York, NY

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.